

EXHIBIT G

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF MASSACHUSETTS

3 TERRI PECHNER-JAMES
4 and SONIA FERNANDEZ,

5 Plaintiffs,

6 VS.

VOLUME VI
C.A. NO. 03-12499-MLW

7 CITY OF REVERE; THOMAS
8 AMBROSINO, MAYOR; CITY OF
9 REVERE POLICE DEPARTMENT,
10 TERRENCE REARDON, CHIEF;
11 BERNARD FOSTER, SALVATORE
12 SANTORO, ROY COLANNINO,
13 FREDERICK ROLAND, THOMAS DOHERTY,
14 JOHN NELSON, JAMES RUSSO,
15 MICHAEL MURPHY, and STEVEN FORD,

16 Defendants.

17 CONTINUED DEPOSITION of SONIA FERNANDEZ taken
18 at the request of the plaintiff pursuant to Rule
19 30 of the Federal Rules of Civil Procedure before
20 Dawn J. Cormier Bourn, a notary public in and for
21 the Commonwealth of Massachusetts, on June 2,
22 2006, commencing at 12:58 p.m. at the Revere City
23 Hall, 281 Broadway, Revere, Massachusetts.
24

COPY

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I N D E X

DEPONENT: SONIA FERNANDEZ

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1 SONIA FERNANDEZ, PREVIOUSLY SWORN.

2 - - - - -

3 FURTHER EXAMINATION BY MR. PORR:

4 Q. We're back on the record with the
5 deposition of Sonia Fernandez.

6 Good afternoon, Ms. Fernandez. How
7 are you?

8 A. A little sick, but okay.

9 Q. A little sick. What do you have?

10 A. Allergies. I'm taking Zyrtec.

11 Q. You took a Zyrtec for your allergies?

12 A. Yes.

13 Q. Is that going to have any impact on
14 you in terms of the deposition?

15 A. No.

16 Q. The first question I was going to ask
17 is what meds you were taking.

18 A. That's why I left it out.

19 Q. Any other medication today?

20 A. No, nothing.

21 Q. How are you feeling besides being
22 stuffed up and clogged up and all that?

23 A. Tired.

24 Q. Okay. Are you okay, though, for

1 A. Because I thought maybe a supervisor
2 would handle it.

3 Q. No, no, that's a different question
4 really.

5 (Discussion held off the record.)

6 Q. I've asked you why you didn't pick
7 them up and throw them away yourself, and you
8 told me that you thought someone would maybe get
9 mad, I thought.

10 A. Yes.

11 Q. And my question was, why did you think
12 someone would get mad if you picked these up and
13 threw them away?

14 A. Because I'm not a supervisor.

15 Q. Why does having -- what does being a
16 supervisor have to do with it?

17 A. This is -- this is disgusting.

18 Q. Well, I understand that.

19 A. And it's insulting. I don't think it
20 was my job as a patrol officer to remove it or to
21 find out who the person is that did it.

22 Q. Okay.

23 A. So I left it there. I thought someone
24 from the administration would look for whoever

1 to the shift.

2 A. I never had a problem with any of them
3 on this shift.

4 Q. Okay.

5 A. Is that what you're asking me?

6 Q. I'm just trying to figure out how it
7 got the name terror shift.

8 A. I have no idea.

9 Q. And the only person on the,
10 quote/unquote, terror shift that you really had a
11 problem with was Crevoiserat because, as you
12 said, he started out mean, ended mean and was
13 mean in between?

14 A. Yeah. I call him a terror.

15 Q. Okay. Fair enough. That's fair.

16 A. I'm not insulting him. I still don't
17 know to this day why this man hates me. I never
18 did anything.

19 Q. No, that's fine. That's fine.

20 We've been going an hour and a half.
21 Do you need to take a break? Would you like --

22 A. I'm fine.

23 (Discussion held off the record.)

24 Q. Let me ask you to take a look at the

1 if that actually happened or not. Oh, my God, I
2 think I'm a mental case.

3 (Discussion held off the record.)

4 A. If there was a third meeting in my
5 home, it was to see if the problems were still
6 existing.

7 Q. Does that mean that the third meeting
8 might have been after this December meeting or
9 after the January '99 meeting?

10 A. Before this meeting took place, before
11 the meetings with the captains.

12 Q. Okay.

13 A. That's the only reason why the
14 meetings took place, to see what kind of progress
15 was going on.

16 Q. I see.

17 A. I don't know if the union tried to
18 resort, you know, go to the captain and try to
19 resolve it on their own or --

20 Q. All right. Let me ask you to turn now
21 to the second page of the December 21, '98, the
22 Paragraph D, 2-D there in the middle of the page.

23 A. I see it.

24 Q. It says, "Certain supervisors," and

1 the hospital suffering from work-related stress."

2 A. Okay.

3 Q. What happened between June 24 of '97
4 and November 11th of '97 that was causing you
5 stress?

6 A. I know I wasn't sleeping well. I
7 wasn't eating well. I just wasn't myself. I
8 don't -- I don't know what was going on.

9 Q. Can you point to any specific
10 incidents that happened in between those two
11 dates?

12 A. Right now, no.

13 Q. Okay. I'm going to dig back through
14 the stack here. Bear with me for a second.

15 A. Can we take a break?

16 MR. PORR: Yeah, yeah. Why don't we
17 do that?

18 (Short recess was taken 3:05 p.m. to
19 3:15 p.m.)

20 (Deposition Exhibit No. 29 marked.)

21 Q. Back on the record.

22 Looking at the complaint, again
23 Paragraph 85, the last half, there's the
24 November 11 date. I could not find any medical

1 principal care physician yesterday," which would
2 be November 18.

3 A. Right.

4 Q. Do you recall why you went and saw
5 your principal care physician on the 18th?

6 A. I think I just had an appointment.
7 I'm not sure.

8 Q. Who would that principal care
9 physician be?

10 A. Ursula Kelly.

11 (Discussion held off the record.)

12 Q. What I'm getting at is, this note
13 references a November 19 visit with Nancy Aronoff
14 and internally indicates that you had a
15 November 18 visit with Ursula Kelly, and I'm
16 trying to figure out if the complaint in
17 Paragraph 85 should be referencing one of those
18 two visits, either to Ursula Kelly on the 18th or
19 to Nancy Aronoff on the 19th or if you saw
20 somebody else on the 11th.

21 A. They prescribed me Valium. The only
22 place I remember being prescribed Valium was at
23 the urgent care.

24 Q. Which urgent care?

1 "Sonia is much improved with her anxiety." I
2 can't remember what H/O is. I do. I've seen
3 that before. Was that true in May of '98 -- oh,
4 history of. H/O is history of. "Sonia is much
5 improved with her history of anxiety." Was that
6 true as of May of '98?

7 A. I think so.

8 Q. It says here, "Negative reaction to
9 Trazodone. Shortness of breath." Do you recall
10 that?

11 A. Yes.

12 Q. So had you quit taking Trazodone as of
13 May '98, May 12th?

14 A. I did.

15 Q. "She will do other interventions to
16 improve sleep with meds. Recommended stress
17 reduction group for fall and continuing
18 one-on-one therapy. Until then, to continue
19 working on self-esteem." Do you recall
20 discussing those things?

21 A. Yes.

22 MR. PORR: All right. I have 5:00, so
23 I think, shall we call it a day?

24 THE WITNESS: If you want to -- I know

1 I owe Mr. Vigliotti.

2 MR. VIGLIOTTI: I'll get mine.

3 MR. PORR: I tell you what, can we do
4 one more medical note and then I'll be switching
5 to another topic and that will probably be a good
6 place to stop.

7 THE WITNESS: And then we'll be done
8 with this?

9 MR. PORR: Well, there's a few more
10 down the road, but let's do one more.

11 THE WITNESS: Where's the shredder?

12 (Deposition Exhibit No. 43 marked.)

13 Q. Okay. Very short note. We've marked
14 it as Exhibit 43. This is May 19 of '98. She
15 labels this a closing note and indicates DNK, did
16 not arrive. Did not arrive, did not appear.

17 A. I didn't want to see her.

18 Q. You knew it was going to be the last
19 session?

20 A. (Nods head.)

21 Q. And so you just didn't want to go?

22 A. I cried my eyes out.

23 Q. I see. Okay.

24 She notes here, "Sonia did not show up

1 for her last appointment. We did talk about her
2 follow-up with Judy -- "

3 A. Scolnick.

4 Q. You mentioned earlier today that you
5 never really got -- hit it off with Judy Scolnick
6 at all?

7 A. I never went to see her. I didn't
8 want to.

9 Q. Okay. Did you ever do the stress
10 management group?

11 A. No. I was just so down when she told
12 me she was leaving.

13 Q. I see. Okay. So you had a good
14 relationship with her in terms --

15 A. I felt like she was helping me.

16 MR. PORR: Okay. All right. Good
17 enough then. So we'll suspend to continue
18 another day.

19 (Deposition suspended at 5:00 p.m.)
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